

PJC  
F. #2021R00440

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK  
----- X

UNITED STATES OF AMERICA

- against -

ZHIBIN LAI,  
also known as "Jason,"

Defendant.

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PLEASE TAKE NOTICE that the undersigned will move this Court, before a judge to be assigned, for leave to file an information upon the defendant ZHIBIN LAI's waiver of indictment pursuant to Rule 7(b) of the Federal Rules of Criminal Procedure.

Dated: Brooklyn, New York  
June 12, 2023

FILED  
IN CLERK'S OFFICE  
US DISTRICT COURT E.D.N.Y.  
\* JUNE 12, 2023 \*  
BROOKLYN OFFICE

NOTICE OF MOTION

Cr. No. 23-CR-246

Judge Kiyo A. Matsumoto  
Magistrate Judge Vera M. Scanlon

BREON PEACE  
United States Attorney  
Eastern District of New York

GLENN S. LEON  
Chief, Fraud Section  
Criminal Division  
U.S. Department of Justice

By: /s/Patrick J. Campbell  
Patrick J. Campbell  
Trial Attorney, Fraud Section  
Criminal Division  
U.S. Department of Justice  
(718) 254-6366

Cc: Clerk of the Court  
Todd Spodek, Esq.